

B15-12639

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO

In Re:

Bobst Collision, Inc.  
  
Debtor

CASE NO. 15-51527

CHAPTER 11

JUDGE JOHN E. HOFFMAN, JR.

(2918 Parsons Avenue, Columbus, OH  
43207)

**OBJECTION OF CREDITOR TO DISCLOSURE STATEMENT (DOC 67) AND  
CONFIRMATION OF PLAN (DOC 66)**

Bayview Loan Servicing, LLC (hereafter "Creditor"), for its Objection to Debtor's Disclosure Statement and Chapter 11 Plan states as follows:

1. Creditor holds a first mortgage on residential real estate owned by Debtor and occupied as a primary residence by the Debtor located at 2918 Parsons Avenue, Columbus, OH 43207;
2. Creditor anticipates filing a Proof of Claim on the mortgage claiming an estimated total debt of over \$433,837.52.
3. The Chapter 11 Plan proposes to reduce Creditor's secured value to \$180,000.00 to be paid over sixty months in the amount of \$3,000.00 a month. Creditor disagrees with the Debtor's proposed property valuation and objects to the restructuring of the mortgage obligation. Creditor believes the valuation of the property is much higher and is in the process of obtaining its own valuation of the property. Creditor asserts that the loan should also be paid with a proper interest rate, pursuant to *Till v. SCS Credit Corporation*, 541 U.S. 465; 124 S. Ct. 1951.

Wherefore, Creditor objects to the Confirmation of Debtor's Plan.

Respectfully submitted,  
The Law Offices of  
John D. Clunk Co., L.P.A.

/S/ LeAnn E. Covey

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 21, 2015, a copy of Objection to Confirmation of Plan was served on the following registered ECF participants, **electronically** through the court's ECF System at the email address registered with the court:

Garry A. Sabol

Jeremy Shane Flannery

Office of the U.S. Trustee

and on the following by **ordinary U.S. mail** addressed to:

Bobst Collision, Inc.  
2918 Parsons Avenue  
Columbus, OH 43207

Franklin County Treasurer  
373 S. High Street  
17th Floor  
Columbus, OH 432156306

/S/ LeAnn E. Covey  
LeAnn E. Covey, Esquire